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STATE OF COLORADO

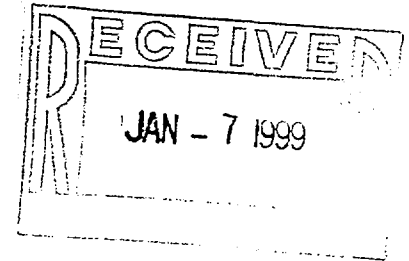
DEPARTMENT OF TRANSPORTATION

4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9011



January 5, 1999

Denver Department of Environmental Health
Ms. Celia Vanderloop
Environmental Services Division
1391 Speer Boulevard
Denver, CO 80204



Dear Ms. Vanderloop:

Pursuant to earlier inquiries by staff from the Denver Environmental Services Division regarding procedures the Colorado Department of Transportation (CDOT) is following during construction activities along I-70 between Washington and Brighton Boulevard, I am providing this update and summary of CDOT's actions. It is required practice and protocol for CDOT to conduct an Initial Site Investigation (ISA) for any CDOT project that entails property acquisition and subsurface intrusion in order to avoid health and safety concerns for the general public and to the workers and to avoid liabilities associated with potentially or known contaminated properties. An Initial Site Investigation was conducted by CDOT for this project area in 1991 which identified various properties of concern relative to contaminated soils or waters. Additional and subsequent ISAs were conducted for the various phases of the planned construction. The properties and land-uses evaluated in the ISAs were either necessary for CDOT to acquire as part of the project improvements or were properties where excavations or sub-surface intrusions were necessary for activities such as utility installation and bridge foundations.

In July 1991 CDOT conducted a Preliminary Site Investigation (PSI) on suspect properties which entailed a drilling and sampling program to determine the environmental status of several properties of concern. The objective of this PSI was to identify if chemical contamination or wastes existed in groundwater or soils and then to determine if any of this contamination required remediation, special health and safety provisions or special material management specifications. Soils and waters were analyzed for volatile and semi-volatile compounds and sixteen Hazardous Substance List (HSL) metals. This PSI recommended that CDOT conduct environmental monitoring during construction activities for both the protection of workers and affected public and to ensure that any disturbance of soils is conducted and managed in accordance with applicable solid and hazardous waste laws or regulations.

In August of 1997 a Materials Management Plan (MMP) was prepared for Phase 1. The I-70 Modifications from North Washington to Humboldt (Walsh-8/12/97) which was followed during this recently completed phase of construction. This MMP detailed procedure and protocols that were required to be followed for construction activities involving the disturbance of soil or water. The purpose and intent of this MMP was twofold; to ensure safe handling of known and potentially contaminated soils or waters for protection of both the workers and to the public and to ensure compliance for managing any contaminated soils or waters that may be generated as

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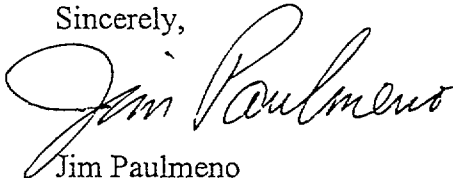
part of this construction phase. In addition to MMP, CDOT's construction contractor was required to prepare a project Health and Safety Plan (Hallmark-11/97) which addressed environmental and worker protection as well as protection for the public at-large.

A materials Management Plan (MMP) has also been prepared for the second and third phases of construction on I-70 from Humboldt/44th Streets to Brighton Boulevard (Walsh-7/98). This MMP directs CDOT's contractor to conduct real time monitoring and screening of generated materials, provide for the proper materials storage and materials staging areas, provide the proper waste lab analysis and identification and for the proper disposal or disposition of solid or hazardous wastes that may be generated as a result of project activities. The contractor is currently preparing a Health & Safety Plan (HASP) for these two phases of construction which will address worker and environmental protection as well as ensuring safety protection to the public at-large. The future phase of construction (phase 4) will also be required to have a MMP and HASP prepared prior to construction. The Contractor has been and will continue to be required to provide dust palliative and particulate controls during construction. CDOT will emphasize the need to implement dust suppression for all current and future phases of construction and CDOT will specify that all trucks with fill and soil materials be covered and taped.

At the present time CDOT's contract is involved in removing underground storage tanks (UST) from properties in the areas between 44th Avenue and Brighton Boulevard, south of I-70. These USTs will be removed and managed pursuant to the State of Colorado Office of Oil Inspection (OIS) closure regulations and any soils or waters generated from these removal actions will be properly characterized and disposed of.

It should be noted that all of the CDOT environmental documents for this project conducted over the past eight years are available to you or the public (See attached list of project documents). These documents include the review of historic and existing land-uses for those properties that may affect the project and the documents include results of soil and groundwater sampling conducted on properties that CDOT has acquired and may affect the project relative to soil and groundwater contamination. I will send you advance copies of the MMPs and HASPs for future construction phases for review. Please let me know if you have any suggestions or recommendations for informing adjacent residential neighborhoods of any CDOT's actions involving materials management or health and safety issues. Please feel free to contact me at (303)757-9787 or E-Mail: Jim.Paulmeno@dot.state.co.us with questions or for any document information you may need.

Sincerely,



Jim Paulmeno
Project Manager

Attachment

cc: Brad Beckham/Sherman
Apostolopoulos-CDPHE
Pat Martinek

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I-70 Brighton Boulevard Environmental Documents

1. Preliminary Site Investigation, I-70 from Lincoln to Washington Streets, May 2, 1990, by Walsh Environmental Scientists and Engineers.
2. Preliminary Site Investigation for the Modification of Interstate 70, Washington Street to Brighton Boulevard, July 31, 1991, and Preliminary Site Assessment Addendum, May 15, 1992, by Walsh Environmental Scientists and Engineers, Inc.
3. Initial Site Assessment Update for I-70 Modifications, Washington to High Street, Denver, Colorado, May 31, 1996, by Walsh Environmental Scientists and Engineers, Inc.
4. Site Investigation Report, Phase 1 Construction, I-70 Modifications, North Washington Street to Humboldt Avenue, prepared by Walsh Environmental, Denver, Colorado dated July 31, 1997.
5. Materials Management Plan, Phase 1 Construction, I-70 Modifications, North Washington Street to Humboldt Avenue, Denver, Colorado, dated July 31, 1997, by Walsh Environmental Scientists and Engineers.
6. Final Site Investigation, I-70 Phase II and III Construction, 44th Street to Brighton Boulevard, City and County of Denver, Colorado, prepared by Walsh Environmental, dated July 23, 1998.
7. Final Materials Management Plan, Phase II and III Construction, I-70 Modifications, Humboldt/44th Streets to Brighton Boulevard, Denver, Colorado, prepared by Walsh Environmental, dated July 24, 1998.